

State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich Governor

September 14, 1999

Mr. Johnny Reising U.S. DOE FEMP P.O. Box 398705 Cincinnati, OH 45329-8705

RE: PSP FOR 3A/4A SUBSURFACE PREDESIGN INVESTIGATION

Dear Mr. Reising:

Ohio EPA has reviewed the *Project Specific Plan For 3A/4A Subsurface Predesign Investigation*. This letter provides, as an attachment, Ohio EPA's comments.

If you should have any questions, please contact Donna Bohannon at (937) 285-6543 or Michelle Waller at (937) 285-6454.

Sincerely,

Thomas A. Schneider

Fernald Project Manager

Office of Federal Facilities Oversight

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cc: Jim Saric U.S. EPA

Terry Hagen, Fluor Daniel Fernald

Ruth Vandegrift, ODH Francis Hodge, Tetratech

Mark Schupe, HSI Geotrans

Manager TPSS, DERR

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PROJECT SPECIFIC PLAN FOR AREA 3A/4A SUBSURFACE PREDESIGN INVESTIGATION

COMMENTS:

1. Commenting Organization: OEPA

Commentor: OFFO

Section #: General

Pg. #: Line #:

Code: C

Original Comment #:

Comment: This document does not provide line numbers. In future submittals, please provide the numbers.

2. Commenting Organization: OEPA

Commentor: OFFO

Section #: 1.1

Pg. #: 1-1

Line #: third bullet Code: C

Original Comment #:

Comment: Figure 1-1 does not show the high leachablility areas in Area 3A/4A.

Please correct.

3. Commenting Organization: OEPA

Commentor: OFFO

Section #: 1.2

Pg. #:1-2

Line #: First full paragraph

Code: C

Original Comment #:

Comment: Project Specific Plans are to be submitted to Ohio EPA and USEPA for any sampling projects to be conducted at Fernald. Along with, Ohio EPA and USEPA's approval must be given before DOE starts work. This was not the case on this PSP for Area 3A/4A project. In addition, any sampling activity that may take place once excavation begins should also be outlined in the excavation PSP in place at the time. This should also include closure sampling activities for any HWMU and UST.

DOE should follow the "lessons learned" during the excavation of the A1P2 Sewage Treatment Plant regarding HWMUs and USTs. Sampling and closure should be done **before** any other excavation activities are begun.

4. Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.2

Pg. #: 2-2

Line #:First full paragraph Code: C

Original Comment #:

Comment: The sampling method discussed in this paragraph states that the uppermost sampling interval will contain <50% gravel, and that remaining debris in

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the samples will be removed. Ohio EPA recommends to start sampling when gravel is less than 15% of the interval. It is not appropriate to remove such a large portion of the sample matrix. Additionally, all gravel will need to go to the OSDF assuming it passes WAC.

5. Commenting Organization: OEPA

Commentor: OFFO

Section #: Figure 2-1

Line #:

Code: C

Original Comment #:

Comment: In Figure 2-1, boring #12486 is somewhat remote from the other locations proposed. Is this location based on historical data?

6. Commenting Organization: OEPA

Commentor: OFFO

Section #: 3.2

Pg. #: 3-2

Line #: Second Paragraph

Code:C

Original Comment #:

Comment: The sampling intervals in Appendix D do not correspond with the wording in this paragraph. For example, the text states that there will be "three foot spacing going down the length of a boring" however, Appendix D shows the spacing falls somewhere in the middle. Also, the first intervals may not be staggered in each boring. Please clarify the sampling strategy in the text.